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March 22, 2022

Via ECF

District Judge Julien Xavier Neals
U.S. District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Airtech International Inc. v. Byungchan Yim et al.*
Case 2:22-cv-00668-JKN-AME

Dear Judge Neals,

This firm is counsel to Plaintiff Airtech International Inc. in the above matter. I write in response to the letter to the Court from defense counsel Ameri earlier today (ECF Doc. No. 25).

The letter is improper since it violates the Court's instructions on two points. First, the Court directed the parties to engage in meet-and-confer regarding any proposed changes to the Temporary Restraining Order (ECF Doc. No. 13) (the "TRO"). Defense counsel engaged in none. Second, the Court directed Plaintiff to submit supplemental briefing justifying the TRO regarding frozen bank accounts. We will submit that briefing by the end of the day tomorrow.

Plaintiff therefore requests that the Court reject defense counsel's letter and direct that meet-and-confer be completed by a date certain regarding both proposed changes to the TRO and the date for Defendants to respond to Plaintiff's emergency discovery demands that relate directly to the basis for continuing the TRO. The TRO should remain unchanged until meet-and-confer and briefing have occurred as the Court instructed.

Respectfully submitted,

KIM & BAE, P. C.

/s/ Christine Bae

Christine M. Bae, Esq.